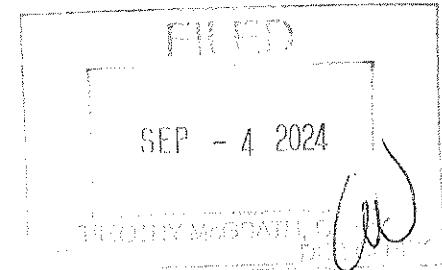


United States Bankruptcy Court
Eastern District of Pennsylvania



In Re:

Chapter 13

Frederick Paul Mraz

Bankruptcy No. 24-11284-AMC

Debtor

Debtors Motion to Retain Chapter 13 Bankruptcy Pursuant to 11 U.S.C. Section 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. The Debtor is Frederick Paul Mraz, 9 Woodchuck Way, Kennett Square, PA 19348
2. The within case was commenced by the filing of a Chapter 13 petition on 4/16/2024
3. The Trustee's Motion to dismiss with a bar order should be rejected for the following reasons:

Debtor has been delayed from making timely payments to the Trustee because of delayed contractual business payments to the Debtor. The issue resulted in a Congressional Inquiry by Senator John Fetterman's office by Devin Gould (202)224-4254 and Bryce Turk (717)829-2942. The inquiry resulted in a bank contract with the funding agent and a schedule for payment.

4. Although the Debtor has filed previous bankruptcy cases, they were filed with absolute intent to honor. There were circumstances that prevented moving our business funding forward, principally the Covid 19 pandemic. The medical emergency not only required our principle funder to leave the country, it forced a major change in the business model. There are funds in the bank designated for our use since March 8, 2023. The most recent bankruptcy petition, filed on 7/19/2023 was voluntarily withdrawn because of the belief that funds were imminent.